



State of New Jersey  
DEPARTMENT OF HEALTH AND SENIOR SERVICES  
OFFICE OF EMERGENCY MEDICAL SERVICES  
PO BOX 360  
TRENTON, N.J. 08625-0360

JON S. CORZINE  
Governor

[www.nj.gov/health](http://www.nj.gov/health)

FRED M. JACOBS, M.D., J.D.  
Commissioner

August 18, 2006

Mr. Jason Greulich

Re: **Notice of Proposed Revocation:**  
**EMT-Basic and EMT-Paramedic Certification #2434**  
Investigation Control # 06-C-061

Dear Mr. Greulich:

The New Jersey Department of Health and Senior Services (the Department) is vested with the responsibility of carrying out the provisions of N.J.S.A. 26:2K-7, et seq., which govern the provision of advanced life support services within the State of New Jersey and the Health Care Facilities Planning Act, N.J.S.A. 26:2H-1, et seq., which was enacted, in part, to ensure that all hospital and related health care services rendered in the State of New Jersey are of the highest quality. As defined at N.J.S.A. 26:2H-2b, health care services include any pre-hospital care rendered by paramedical and ambulance services. These laws establish a scheme that permits certain individuals, once certified, to perform basic life support (BLS) and/or advanced life support (ALS) services. In furtherance of the objectives set forth in the statutes, the Department has adopted administrative rules that govern the training, certification and professional conduct of EMT-Basics, EMT-Basic Instructors and EMT-Paramedics. See N.J.A.C. 8:40A-1.1, et seq. and N.J.A.C. 8:41A-1.1, et seq.

On April 7, 2006, the Department's Office of Emergency Medical Services (OEMS) received a report of an unusual occurrence and a news article in which you were accused of embezzling a controlled dangerous substance (Morphine) from your employer, Wake County Emergency Medical Service (EMS).

OEMS initiated an investigation in response to this information. The material provided to OEMS indicated that the Wake County EMS Supervisor, who conducts daily inventory of the controlled substances, noticed that the tamper-proof containers of the morphine were opened and that the packaging was altered. The packages were sent to an independent lab for testing. The findings indicated that the morphine was removed

from the syringe and replaced with a saline solution.

The Raleigh Police Department also conducted an investigation into this matter and was able to trace your fingerprints on the morphine syringes inside of the tamper-proof packages. At that time, you were arrested and charged with embezzling a controlled dangerous substance. The Wake County Prosecutor's Office provided OEMS with copies of your warrant for arrest, where on March 14, 2006, you were charged with seventeen (17) counts of embezzling a controlled dangerous substance and two (2) counts of refusing or failing to keep records.

OEMS is the agency responsible for certifying EMT-Basics, EMT-Basic Instructors and EMT-Paramedics. It is this Department's obligation to ensure the health and safety of the public with whom you may come into contact. If there is any justifiable reason for this Department to believe that your continued certification as an EMT-Basic and EMT-Paramedic poses a threat to the public health and safety, it is our obligation to initiate proceedings for the immediate revocation of that certification.

N.J.A.C. 8:41A-5.2(b) states that, "The Commissioner, or his or her designee, may issue a formal written warning, impose a monetary penalty, place on probation, suspend, revoke and/or refuse to issue or renew the certification of any EMT-Paramedic for violation of any of the rules set forth in this chapter. This shall include, but is not limited to:

12. Conviction of any crime;
13. Conviction of any disorderly persons offense;
14. Conviction of a petty disorderly persons offense involving the possession, utilization, sale and/or distribution of any controlled dangerous substance; representing a risk of harm to the health, safety or welfare of patients; and/or involving patient abuse or patient neglect;
15. Misuse, misappropriation or theft of any drug, medication or equipment;
25. Failure to comply with any part of this chapter, any applicable part of N.J.A.C. 8:40 or 8:41, or any applicable law, rule and/or regulation; and/or
26. Any other action deemed by the Department to pose a threat to public health, safety or welfare."

N.J.A.C. 8:40A-10.2(b) states that, "The Commissioner, or his or her designee, may issue a formal written warning, impose a monetary penalty, place on probation, suspend, revoke and/or refuse to issue or renew the certification of any EMT-Basic or EMT-Instructor for violation of any of the rules set forth in this chapter. This includes, but is not limited to:



12. Conviction of any crime;
13. Conviction of any disorderly persons offense;
14. Conviction of a petty disorderly persons offense involving the possession, utilization, sale and/or distribution of any controlled dangerous substance; representing a risk of harm to the health, safety or welfare of patients; and/or involving patient abuse or patient neglect;
15. Misuse, misappropriation or theft of any drug, medication or equipment;
23. Failure to comply with any part of this chapter, any applicable part of N.J.A.C. 8:40 or N.J.A.C. 8:41, or any applicable law, rule and/or regulation; and/or
24. Any other action deemed by the Department to pose a threat to the public health, safety or welfare."

Your certifications entitle you to render emergency medical services to the public and to have access to areas where narcotics are stored as well as to the narcotics themselves. Your EMT-Paramedic certification authorizes you to administer narcotics to patients using syringes. The above referenced violations of law and administrative rules are incompatible with the duties of certified EMT-Basics and EMT-Paramedics.

**Therefore, in accordance with N.J.A.C. 8:40A-10.2(b) and N.J.A.C. 8:41A-5.2(b), this Department intends to revoke your EMT-Basic and EMT-Paramedic certifications, thereby rendering you ineligible to practice as an EMT-Basic or EMT-Paramedic within the State of New Jersey.**

Pursuant to N.J.S.A. 26:2K-9, N.J.S.A. 26:2H-13, N.J.A.C. 8:40A-10.3 and N.J.A.C. 8:41A-5.3, you are entitled to a hearing before the Office of Administrative Law to contest this proposed revocation. Your request for a hearing on this matter must be submitted in writing and must be accompanied by a response to the charges contained herein.

New Jersey Department of Health & Senior Services  
Office of Legal & Regulatory Affairs  
P.O. Box 360, Room 805  
Trenton, NJ 08625-0360  
Attn: Ms. Michele Stark

Please include the control number 06-C-061 on all of your correspondence.  
**Finally, please note that your failure to submit a request for a hearing within 30 days shall be interpreted as an acceptance of this Department's decision, thereby negating any further appeal rights.** If you have any questions concerning this matter,

please do not hesitate to contact Mr. Samuel Stewart, OEMS Regulatory Officer, at (609) 633-7777.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Halupke", written in a cursive style.

Karen Halupke, R.N., M.Ed.  
Director  
Office of Emergency Medical Services

c: David Gruber, Senior Assistant Commissioner,  
Division of Health Infrastructure Preparedness and Emergency Response  
Joseph Tricarico, Jr., Assistant Commissioner,  
Health Infrastructure Preparedness Bureau  
Samuel Stewart, OEMS Regulatory Officer  
Charles McSweeney, OEMS Operations Coordinator  
Donald Roberts, OEMS Investigator  
Michele Stark, OL&RA

SENT VIA REGULAR U.S. MAIL AND  
CERTIFIED MAIL #70022410000334704425  
RETURN RECEIPT REQUESTED